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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>IN RE:</p> <p>McCLAIN FEED YARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,</p> <p>Debtors.</p>	<p>Case No. 23-20084-rlj Chapter 7</p> <p>Jointly Administered</p>
<p>IN RE:</p> <p>2B FARMS, a Texas General Partnership, et al.,</p> <p>Debtors.</p>	<p>Case No. 23-50096-rlj Chapter 12</p> <p>Jointly Administered</p>
<p>IN RE:</p> <p>AGTEXAS FARM CREDIT SERVICES; AGTEXAS, PCA; AND THORLAKSON DIAMOND T FEEDERS, LP</p> <p>Plaintiffs,</p> <p>and</p> <p>EDWARD DUFURRENA et al., Intervenor-Plaintiffs</p>	<p>ADV. PROC. NO. 24-02007-rlj</p> <p>(Consolidated Adversary Proceeding)</p>

<p>v.</p> <p>RABO AGRIFINANCE, LLC et al.,</p> <p>Defendants</p>	
<p>IN RE:</p> <p>HTLF BANK, as successor to FIRST BANK & TRUST,</p> <p>Plaintiffs, Counter-Defendant, and Cross-Claim Defendant,</p> <p>v.</p> <p>2B FARMS, a Texas General Partnership, et al., TERRY M. ROBINSON, and REBECCA A. ROBINSON,</p> <p>Defendants, Counterclaim-Plaintiffs, Third-Party Plaintiffs and Third-Party Counterclaim Defendants,</p> <p>v.</p> <p>RABO AGRIFINANCE LLC and MECHANICS BANK,</p> <p>Third-Party Defendants, and as to Rabo AgriFinance LLC only, Third-Party Counterclaim Plaintiff and Cross-Claim Plaintiff.</p>	<p>ADV. PROC. NO. 24-02007-rlj</p> <p>(Consolidated Adversary Proceeding)</p>

DEFENDANT MEAGAN B. GOAD'S MOTION TO DISMISS

Comes now, Meagan B. Goad (“Goad”), by and through undersigned counsel, and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable to adversary proceedings by Rule 7012 of the Federal Rules of Bankruptcy Procedure, hereby files her Motion to Dismiss all claims against her in the above-captioned adversary

proceeding. In support of this Motion, Goad submits the attached Memorandum of Law in Support of Meagan B. Goad's Motion to Dismiss.

STATEMENT REGARDING JURISDICTION

Goad does not consent to the jurisdiction or the entry of final orders or judgment by the United States Bankruptcy Court for the Northern District of Texas in this proceeding. Goad reserves all rights, remedies and legal theories, including her right to request a trial by jury and her right to seek withdrawal of the reference and transfer of venue. This statement is made in compliance with Rule 7012(b) of the Federal Rules of Bankruptcy Procedure.

DATED: June 5, 2025.

By: /s/ Charity S. Bird

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ATTORNEYS FOR MEAGAN GOAD

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, a true and correct copy of the foregoing was served via the Court's ECF system on all parties that have appeared and requested notice via the Court's ECF system.

/s/ Charity S. Bird
Charity S. Bird